

Phillip A. Raymond, Esq.
McCalla Raymer Leibert Pierce, LLC
485F US Highway 1 S
Suite 300
Iselin, NJ 08830
Telephone: (732) 902-5399
NJ_ECF_Notices@mccalla.com
Attorneys for Secured Creditor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 11
635 Norfolk LLC,	Case No. 22-12643-SLM
	Hearing Date: July 12, 2022 at 11:00 AM
Debtor.	Judge: Stacey L. Meisel

**NOTICE OF MOTION OF JPMORGAN CHASE BANK NATIONAL ASSOCIATION'S
MOTION FOR AN ORDER: (I) DISMISSING THE BANKRUPTCY FOR BAD FAITH
FILING PURSUANT TO 11 U.S.C. § 1112(B), OR, ALTERNATIVELY, (II) STAY
RELIEF PURSUANT TO 11 U.S.C. § 362(D)(1) "FOR CAUSE" AND (D)(2) BECAUSE
THE REAL PROPERTY IS NOT NECESSARY FOR EFFECTIVE
REORGANIZATION, (III) IN REM RELIEF PURSUANT TO THE COURT'S
EQUITABLE POWERS SET FORTH IN 11 U.S.C. § 105(A)**

TO: 635 Norfolk Street
Teaneck, New Jersey 07666
Debtor

Karina Pia Lucid
Karina Pia Lucid, Esq., LLC
1065 Route 22 West
Suite 2b
Bridgewater, New Jersey 08807
Debtor's Counsel

Peter J. D'Auria
Office of the U.S. Trustee
One Newark Center
Suite 2100
Newark, New Jersey 07102

U.S. Trustee
US Dept of Justice
Office of the US Trustee
One Newark Center Ste 2100
Newark, NJ 07102

PLEASE TAKE NOTICE that on **July 12, 2022 at 11:00 AM** or as soon thereafter as counsel can be heard, the undersigned attorneys JPMorgan Chase Bank, National Association (“Movant”), will move before the United States Bankruptcy Court, Honorable Stacey L. Meisel, United States Bankruptcy Judge, 50 Walnut Street, 3rd Floor, Newark, N.J. 07102 for an Order:

1. Dismissing Debtor’s Chapter 11 case for bad faith filing pursuant to 11 U.S.C. § 1112(b); or, alternatively
2. Stay relief pursuant to 11 U.S.C. §§ 362(d)(1) “for cause” and (d)(2) because the property is not necessary for effective reorganization;
3. In rem relief pursuant to the Court’s equitable powers set forth in 11 U.S.C. § 105(a); and
4. Granting Movant such other and further relief as is just and proper.

Dated: June 9, 2022

McCalla Raymer Leibert Pierce, LLC
Attorneys for JPMorgan Chase Bank, National
Association

/s/Phillip A. Raymond

By: /ss/Phillip A. Raymond